

LOG OF MEETING DIRECTORATE FOR ENGINEERING SCIENCES

SUBJECT: UL 8400 STP Meeting on Immersive Technologies

DATE OF MEETING: September 27, 2022, 7:00pm, ET

LOG ENTRY SOURCE: Treye Thomas (EXHR)

DATE OF LOG ENTRY: October 24, 2022

LOCATION: Teleconference

CPSC ATTENDEE(S): Treye Thomas (EXHR) and Stephen Harsanyi (ESHF)

NON-CPSC ATTENDEE(S): Contact UL for the attendee list.

Summary of Meeting:

The standard technical panel (STP) for draft standard UL 8400, *The Proposed First Edition of the Standard for Safety for Virtual Reality, Augmented Reality, and Mixed Reality Technology Equipment*, met to discuss requirements for Virtual Reality (VR), Augmented Reality (AR), and Mixed Reality (MR) products. The STP discussed comments and recommended revisions to the recently balloted first edition of UL 8400 (ballot closed on August 2, 2022).

The STP discussed Clause 13 and Annex F, which pertain to safety and warning instructions for the subject immersive technologies. CPSC staff led the discussions pertaining to these sections of the draft standard. CPSC staff reiterated concerns that the draft standard relies too heavily on informative recommendations, and that normative requirements are paramount to consumer safety. CPSC staff explained that it is particularly important to have normative requirements for warnings pertaining to use by children and other vulnerable populations because the performance-based requirements in the standard do not adequately address use by these foreseeable populations. CPSC staff mentioned that they previously recommended access/parental controls as well, but the STP had decided not to include such requirements in the first iteration of the standard. CPSC staff explained that there has already been one recall involving a VR product, which involved a hazard that resulted in consumer injuries, and explained that recalls can be financially burdensome for all stakeholders, so it is important to incorporate sufficient requirements in the standard.

Several members in the group opined that these sections in the standard should act more as very general guidance than require specific language and formats; affording manufacturers the autonomy and authority to determine what safety messaging is appropriate for their products. Explanations for this rationale centered on the following concerns, among others: the wide variety of products and applications subject to the standard, the limited research regarding the products and applications, and the risk of stifling innovation. Several members opined that the risk assessment should ultimately determine what is appropriate for the specific product. CPSC staff volunteered to edit the draft sections further to account for the STP's comments.

Several members voiced concerns regarding specifying a minimum age for use of the subject products. One member stated that there should be no age label as it stifles innovation. One member requested that an advisory note in Clause 13 should more clearly indicate the limitations of existing research. Several members recommended changing the draft age label requirement from "14 years and older" to "13 years and older." One member stated the following:

There is a fairly continuous development of binocular disparity processing (i.e., stereoacuity) until maturation at about 12 years of age; before that we do not know what the impact of these systems will be on the visual system of youth.

This member supported an age label of 13 years and older, contingent on the IPD range accommodating children.

Next Steps:

The STP will meet again on October 19, 2022, at 7pm, ET. The STP will continue discussing the comments and recommended revisions on the recent ballot, particularly the clause and annex pertaining to safety and warning instructions.